

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

In Re:

OWNBEY, GARY FRANK

Debtor(s)

Case No. 11-01618-B

Chapter 7

MOTION FOR EXTENSION OF TIME TO OBJECT TO DISCHARGE OF DEBTOR(S)

NOW COMES, John K. Fort, Trustee in the above captioned case and requests that the court enter an order to extend the time to object to the discharge of debtor(s). In support of the Motion, the Trustee would show the Court the following:

1. The debtor filed for Chapter 7 Bankruptcy relief on March 11, 2011. The First Meeting of Creditors scheduled for April 20, 2011 was continued to and held on May 18, 2011. The Trustee determined this to be an asset case.
2. The Trustee is still in the process of investigating the assets and financials of the case and cannot make a determination as to whether or not to object to a discharge pursuant to 11 USC §727 until he completes his investigation.
3. The date to object to the discharge of debtor(s) is June 20, 2011.
4. Rule 9006 allows the extension of time provided the request is made before the expiration of the period originally prescribed or as extended by a previous order.

Pursuant to the foregoing, the Trustee prays that the court extend the date to object to discharge of debtor(s) for a period of 60 days and grant such other and further relief as it deems just and proper.

Dated: June 14, 2011

/s/ John Kirkland Fort

John Kirkland Fort

Chapter 7 Trustee

P.O. Box 813

Drayton, SC 29333

864-573-5311

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NOTICE OF MOTION/APPLICATION AND OPPORTUNITY FOR HEARING

TAKE NOTICE that John Kirkland Fort filed a Motion for Extension of Time to Object to Discharge of Debtor(s). A copy of the motion and proposed order accompanies this notice.

TAKE FURTHER NOTICE that any response, return and/or objections to this applications, should be filed with the Clerk of the Bankruptcy Court, 1100 Laurel Street, Columbia, SC 29201, no later than **14 days** from service of motion/application and a copy simultaneously served on all parties in interest.

TAKE FURTHER NOTICE that no hearing will be held on this application unless a response, return and/or objection is timely filed and served, in which case the Court will conduct a hearing on **JULY 14, 2011** at **1:30 P. M.**, at Donald Stuart Russell Federal Courthouse, 201 Magnolia Street, Spartanburg, SC 29306-2355. No further notice of this hearing will be given.

Dated this 14th day of June, 2011

/s/ John Kirkland Fort
John Kirkland Fort, Trustee
District Court # 863
PO Box 813
Drayton, SC 29333
864-573-5311

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CERTIFICATE OF SERVICE BY MAIL

I hereby certify that I have on this 15th day of June, 2011, served a copy of the Motion for Extension of Time to Object to Discharge of Debtor(s), Notice of Motion/Application and Opportunity for Hearing and Proposed Order for Extension of Time to Object to Discharge of Debtor(s) on all names listed below:

RANDY A. SKINNER
PO BOX 1843
GREENVILLE, SC 29602-1843

OWNBEY, GARY FRANK
108 PINEBROOK DRIVE
BOILING SPRINGS, SC 29316

by placing a copy thereof in the United States Mail properly addressed and first class postage prepaid.

/s/ Rosetta Kohara
Rosetta Kohara
Bankruptcy Specialist

Dated in Spartanburg, SC

June 15, 2011